

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

MICHAEL ANGELO,

Defendant.

Case No. 4:22-CR-20188

Judge: Hon. Matthew F. Ludington

**Government's Response to Defendant's Motion for
Extension of Time to File Motion to Dismiss**

The United States of America hereby files this response to Defendant's motion for an extension of time to file a motion to dismiss. ECF No. 284. The government previously expressed its concerns to defense counsel as to whether the requested extension was necessary. The claims made by Defendant Fayad are specific to the aggravated identity charge against him and are irrelevant to Defendant Angelo. But it appears that Defendant Angelo also contemplates different claims related to information more recently provided by the government. Therefore, while the government strenuously disagrees with the assertions made in the Defendant's motion for an extension and intends to thoroughly respond to

each of the allegations made therein at the appropriate time, it will no longer oppose the requested 14-day extension for the filing of a motion to dismiss.

Date: August 26, 2024

Respectfully submitted,
STUART M. GOLDBERG
Acting Deputy Assistant Attorney General
U.S. Department of Justice, Tax Division

/s/Mark McDonald
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CERTIFICATE OF SERVICE

I hereby certify that on August 26, 2024, I electronically filed a copy of the foregoing document with the Clerk of the Court using the ECF system. The ECF system will automatically serve counsel of record.

/s/ Mark McDonald

Mark McDonald

Trial Attorney